FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6128
WEYERHAEUSER BAY CITY SORTING YARD

TABLE OF CONTENTS

Page

INTRODUCTION

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6128. The Department of Ecology (Department) is proposing to issue this permit, which will allow discharge of wastewater to the Aberdeen Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department's decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law [Revised Code of Washington (RCW) 90.48.080 and 90.48.160] requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities that discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit [Chapter 173-216 Washington Administrative Code (WAC)].

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department's response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix C—Response to Comments.

GENERAL INFORMATION	
Applicant:	Weyerhaeuser Company
Facility Name and Address:	Bay City Sorting Yard 425 E. Perry St. Aberdeen, WA
Type of Facility:	Truck and Heavy Equipment Maintenance Shop
Facility Discharge Location:	Sewer: Latitude: 46° 57' 56" N Longitude: 123° 46' 50" W POTW: Latitude: 46° 57' 48"N Longitude: 123° 49' 25" W
Treatment Plant Receiving Discharge:	Aberdeen Wastewater Treatment Plant
Contact at Facility:	Name: Steve Miller Telephone #: (360) 537-8214
Responsible Official:	Name: Robert A. Gooding Telephone #: (253) 924-7974 FAX # (253) 924-7923

BACKGROUND INFORMATION

DESCRIPTION OF THE FACILITY

This facility is a part of a much larger operation, the Bay City Sorting Yard. This facility is not a significant industrial user for the following reasons:

Its flow (Max. 1,500 gpd) is less than 25,000 gpm and less than 5 percent of the flow of the Aberdeen POTW.

It does not discharge any substances that would cause pass through pollution, interfere with POTW processes or contaminate the sludge produced by the POTW.

HISTORY

This shop has remained the same since the last permit was issued. The Weyerhaeuser operation at this location has been there for a long time.

INDUSTRIAL PROCESSES

The shop facility repairs and services heavy equipment and trucks used in the log yard. Equipment is washed periodically as a necessary service and is washed prior to being repaired in the shop. The shop employs 14 men working five days per week, three shifts per day for the entire year. Equipment and trucks are parked on the washrack, washed with water and steam cleaned as necessary. Dirt that is removed is pushed into a pit. Water laden with soil is filtered, settled in a basin and decanted into an oil-water separator. From the oil-water separator the wastewater flows to a manhole in the city sewer. Solid wastes from the mud pit and the settling basin is removed and sent to the Weyerhaeuser composting facility at Little River. If toxicity is suspected in the solid waste it is sent to a landfill in Longview, Washington. The only chemicals stored at this site are detergents. This is a permit renewal.

PERMIT STATUS

The previous permit for this facility was issued on April 26, 2000.

An application for permit renewal was submitted to the Department on March 30, 2004, and accepted by the Department on July 20, 2004.

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

A compliance inspection with sampling was conducted on June 12, 2001.

The database shows numerous violations of the permit limits. Most of these were not actual deleterious discharges, but were the result of a faulty reporting form (DMR). Actual permit violations consisted of three oil and grease violations and two total suspended solids violations. Given these violations, sampling frequency has been increased to monthly.

WASTEWATER CHARACTERIZATION

The concentration of pollutants in the discharge was reported in the permit application and in discharge monitoring reports. The proposed wastewater discharge is characterized for the following parameters:

Parameter	Concentration
Flow, gpd	1401 maximum, 983 average
Total Suspended Solids , mg/L	340 maximum, 265 average
pH, S.U.	Minimum 6.5, Maximum 7.9
Oil and Grease, mg/L	52 average, 62 maximum
Zinc, mg/L	1.31 average, 3.6 maximum

PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS
All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110).

There are two basic methods for determining AKART. The first is a limit established for a category of industry or by analogy to particular technology. There are no categorical limits established for truck and machinery washing.

The second method of determining AKART limits is by a statistical method shown in Chapter IV of the Water Quality Program Permit Writers Manual. The calculations used to derive these limits in the existing permit issued on April 26, 2000 were shown in Appendix C of that Permit.

PERFORMANCE BASED AKART LIMITS

Parameter	Quarterly Average Limit	Quarterly Maximum Day Limit
Oil and Grease	51 mg/L	168 mg/L
Total Suspended Solids	210 mg/L	805 mg/L

EFFLUENT LIMITATIONS FROM LOCAL LIMITS:

Parameter	Limitation
Oil and Grease	300 mg/L
Temperature	65 º C
Biochemical Oxygen Demand, 5 day	300 mg/L
Total Suspended Solids	350 mg/L
pH	5.5 to 9 SU

Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge.

COMPARISON OF LIMITATIONS WITH THE EXISTING PERMIT ISSUED APRIL 26, 2000

Parameter	Permit Limits, Permit issued April 26, 2000	Proposed Permit
Flow, gpd	None	None
Oil and Grease, mg/l	51 Avg, 168 Max.	51 Avg, 168 Max.
Total Suspended Solids, mg/l	350	350
pH, S.U.	5.5 to 9	5.5 to 9

MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S2. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring. The monitoring frequency, previously reduced to quarterly for good compliance, is hereby increased to monthly for reduced performance.

OTHER PERMIT CONDITIONS

REPORTING AND RECORDKEEPING

The conditions of S2 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)].

OPERATIONS AND MAINTENANCE

The proposed permit contains condition S.3. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

PROHIBITED DISCHARGES

Certain pollutants are prohibited from being discharged to the POTW. These include substances which cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

DILUTION PROHIBITED

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

SOLID WASTE PLAN

The Department has determined that the Permittee has a potential to cause pollution of the waters of the state from leachate of solid waste. A solid waste plan is required.

GENERAL CONDITIONS

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

PUBLIC NOTIFICATION OF NONCOMPLIANCE

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a period corresponding to the permit renewal cycle in the watershed (five years).

APPENDICES

APPENDIX A—PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on March 21, 2004 and March 28, 2004, in the Aberdeen's *The Daily World* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on September 29, 2004 in the Aberdeen's *The Daily World* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator
Department of Ecology
Southwest Regional Office - Water Quality
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30 day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

The Department will consider all comments received within 30 days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6285 or by writing to the address listed above.

This permit was written by Gary Anderson.

APPENDIX B—GLOSSARY

Ammonia—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation—The average of the measured values obtained over a calendar month's time.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD_5--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass—The intentional diversion of waste streams from any portion of the collection or treatment facility.

Categorical Pretreatment Standards—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Engineering Report—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

Grab Sample—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

Industrial User—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial Wastewater—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Interference— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local Limits—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Maximum Daily Discharge Limitation—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

Pass-through— A discharge which exits the POTW into waters of the–State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

pH—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Potential Significant Industrial User--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;

b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Significant Industrial User (SIU)--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug Discharge—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

State Waters—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

Total Dissolved Solids—That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of

various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C-RESPONSE TO COMMENTS

Comment 1

It is inconceivable that the waste stream temperature for this permit would cause a headworks temperature of 40° C at the Aberdeen POTW. The temperature limit should be removed from the permit.

Response:

The permit writer is unable to determine the source of this figure of 40° C. The permit limit is 60º C. It is seldom that any individual discharge has a significant effect on a POTW. What is of interest is the cumulative effect of all discharges on the POTW. The only practical way to regulate headworks temperature is to regulate it at the source.

Comment 2

Sampling frequency has been increased in this proposed permit from quarterly to monthly. Violations of the limits have been insignificant. The number of violations shown on the fact sheet is in error.

Response:

As a matter of Ecology policy, sampling frequencies are increased for bad performance and decreased for good performance. During the permit period prior to the existing permit, Weyerhaeuser's performance was exemplary, so that the sampling frequency was reduced. Weyerhaeuser's performance was so good at this time that this office recommended that any party wishing to build a similar facility should emulate Weyerhaeuser's design. During the period of the present permit, Weyerhaeuser's performance has been substandard. As a result, the sampling frequency has been increased.

As a matter of regulation, there are no "minor" violations, just violations.

Further, there have been problems with sampling and reporting. During the period of the present permit, there have been seven late submissions of discharge monitoring reports. It has been observed that quarterly sampling often leed to the permittee forgetting to sample and report. It is hoped that monthly sampling will be frequent enough to keep Weyerhaeuser mindful of its obligations.

The five violations quoted in the fact sheet are actually seven violations if both monthly average and maximum daily violations are counted on the same day.

Copies of Ecology data base records showing all violations are attached along with the signed discharge monitoring reports that verify the data base.